

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

CIVIL ACTION NO.: 5:14-CV-00178-H

GUSTAVO ROMANELLO,	)
	)
Plaintiff,	)
vs.	)
	)
BANKUNITED, N.A.	)
	)
Defendant,	)
_____	)

**JOINT RULE 26(f) REPORT**

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was conducted on June 6, 2014 and Gustavo Romanello, *Plaintiff Pro Se* and Sean T. Partrick, counsel for Defendant participated in the meeting.

2. **Pre-Discovery Disclosures.** The parties will exchange by August 1, 2014 the information required by Fed. R. Civ. P. 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan: Standard

- a. Discovery will be needed on the following subjects: relevant privilege information, testimony, documents related to the allegations and claims advanced by Plaintiffs and allegations, denials and affirmative defenses of the Defendant.
- b. All discovery commenced in time to be completed by December 30, 2014. The parties may conduct for trial depositions of experts at any time through February 28, 2015.
- c. The number of discovery depositions will not be limited.
- d. Reports from retained experts under Rule 26(a)(2) along with a list of each expert's available dates for depositions are due during the discovery period: From Plaintiffs by September 30, 2014, from Defendant by November 30, 2014.

- e. Supplementations under Rule 26(e) are due during the discovery period from all parties in a timely manner upon learning that in some material respect a disclosure or response previously made is incomplete or incorrect.

4. **Other items.**

- a. The parties do not request a conference with the Court before the entry of a scheduling order.
- b. The parties request a pretrial conference in April 30, 2015.
- c. The parties should be allowed until September 30, 2014 to move to join additional parties or amend Pleadings.
- d. All potentially dispositive motions should be filed by March 30, 2015.
- e. The parties have discussed settlement and may request that a Mediation Settlement Conference take place in this matter late in the discovery process or by October 31, 2014.
- f. At least 30 days before the final pretrial conference, Plaintiffs shall provide Defendants with the Plaintiffs' final list of witnesses and exhibits under Rule 26(a)(3) and all Defendant shall exchange with Plaintiffs the Defendant's final list of witnesses and exhibits unde Rule 26(a)(3).
- g. Fifteen days before the pretrial conference, any party may designate and serve any objections to the disclosures.
- h. The parties' Rule 26(a)(3) disclosures and objections shall be incorporated into the final pretrial order. The pretrial order shall be submitted to the court five days prior to the pretrial conference.
- i. The case should be ready for trial by May 30, 2015 or no less than 90 days after any dispositive motion(s) have been filed, served and heard, whichever is later. The parties expect trial of this action to take approximately one week.
- j. The parties have discussed special procedures for managing the case, including referral to a Magistrate Judge and Defendant does not consent to referral of the case to a Magistrate Judge.

This the 16<sup>th</sup> day of June, 2014

**YATES, MCLAMB & WEYHER, LLP**

/S/ Gustavo Romanello  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: and I hereby certify that I have mailed the document to the following non CM/ECF Participants:

Gustavo Romanello  
5317 Cottage Bluff Lane  
Knightdale, NC 27545  
*Plaintiff Pro Se*

This the 16<sup>th</sup> day of June, 2014

**YATES, MCLAMB & WEYHER, LLP**

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